

ICSID Case No. ARB/07/5

**ABACLAT AND OTHERS
(CLAIMANTS)**

and

**THE ARGENTINE REPUBLIC
(RESPONDENT)**

ALTERNATIVE WORK PROPOSAL

**in accordance with paragraph 23
of Procedural Order No. 15**

submitted by

Dr. Norbert Wühler

22 January 2013

Background to the Alternative Work Proposal

This **Alternative Work Proposal** is submitted in response to the message from the President of the Tribunal that was conveyed to the undersigned by email from the ICSID Secretariat of 17 January 2013. The Alternative Work Proposal follows the earlier submission by the undersigned of a **Work Proposal** pursuant to paragraph 18 of Procedural Order No. 15.

As summarized in the message from the President of the Tribunal, the methodology suggested in the Work Proposal was “a sampling for all Claimants in Annexes A, B and C, although the size of the sample may vary from one category to the other.” The message inquires whether it would be possible for the undersigned “to examine all Claimants documents without sampling, i.e. by verifying the information for each Claimant individually. In particular, we would like to know (i) whether you believe this is feasible, and (ii) if so, what would be the impact of such change in method on your Proposal in terms of personnel, time and costs.”

The undersigned believes that it is feasible to verify the relevant information for each Claimant individually. In order to present a self-contained and comprehensive document describing all that is needed to perform the Expert’s Mission in this alternative, the methodology and steps that the undersigned suggests are required for the individual examination and verification of all relevant Claimant information and documents are set out in this Alternative Work Proposal. The Alternative Work Proposal incorporates those steps from the previously submitted Work Proposal that are applicable in this alternative.

The **main impact of the change from sampling to individual review** of all relevant claimant information and documentation can be summarized as follows: (i) an additional 15 persons are needed for the review of the claims of natural persons (Annex A); (ii) it will take at least one month longer to submit the Draft Verification Report; and (iii) the costs will be almost USD 180,000 higher, namely USD 270,350.

Scope of the Expert's Mission

The Work Proposal that the undersigned submitted on 26 December 2012 included a detailed description of the undersigned's team, the methodology and steps he planned to follow (together with milestones), a (non-exhaustive) list of the documents and information he would need, as well as a detailed budget estimate of his fees and expenses. The same details are included in this Alternative Work Proposal.

The scope of the Expert's Mission is set out in Section C of Procedural Order No. 15 as follows. According to paragraph 19 of the Order, "the aim of the **Expert's Mission ("the Expertise")** is to examine and verify the information contained in Claimants' Database for the purposes of [...] para 501 (iii) [of the Tribunal's Decision on Jurisdiction and Admissibility]." Paragraph 19 of the Order lists the respective information with regard to natural and juridical persons.

According to paragraph 21 of Procedural Order No. 15, "[i]n examining and verifying the information contained in the Claimants' Database, the Expert shall pay particular attention to the following issues:

- (i) Whether or not the information contained in the Claimants' Database and the documents relating thereto appear to be comprehensive, i.e. sufficient to make the factual determinations set out in para 19 [of the Order];
- (ii) Whether or not the information contained in the Claimants' Database and the documents relating thereto are organized in a manageable and easily searchable way, which allow a reliable verification of the information in the Database against (a) the documents on which this information is based, and/or (b) the factual circumstances set out in para 19 [of the Order];
- (iii) Whether or not the information contained in the Claimants' Database and the documents relating thereto contain any inconsistencies, discrepancies or any duplication or any vice affecting Claimants' Database or the documents themselves;
- (iv) Whether or not the Expert encountered any particular difficulty in the conduct of the Expertise due to the design or functioning of Claimants' Database or the way the information is organized;

- (v) Any other issue that the Expert may consider sufficiently relevant to justify drawing the attention of the Arbitral Tribunal to.”

A. Preparation of Work Proposal and Alternative Work Proposal

To be able to assess the nature and amount of work to be done, the undersigned was provided access to the Claimants’ online Database, including the annexes in pdf and mdb formats and the related documents. No further explanation or information was provided.

To prepare the Work Proposal, the undersigned undertook the following activities:

- (i) Review of the Annexes, including what types of information they contain and how this information is organized;
- (ii) Spot-checking of the relationships between Annex K and Annexes A, B and C, and between Annex L and Annexes A, B and C;
- (iii) Testing of various ways to access and navigate the information in the database and the related documents;
- (iv) Review of the database information and the related documents for a random selection of claims from Annexes A, B and C - for natural persons, a higher number of claims was reviewed where the Index to Annex A listed the same name or the same file number more than once; for juridical entities, a higher number of claims was reviewed, in particular for incorporation and authorized signatory information and documents, where it appeared that the claims were made by non-commercial entities;
- (v) Selection of the parameters according to which claim categories and groups should be proposed for individual and sample review, respectively, and determination of sample size; and
- (vi) Identification of the team proposed to assist in the Expertise.

To prepare the Alternative Work Proposal, the undersigned undertook the following additional activity:

- (vii) Identification of the team proposed to assist in the individual examination and verification of the information and documentation relating to the claims by natural persons (Annex A).

Taking into account the results of the above activities, the undersigned developed the methodology and steps he plans to follow, identified the documents and information he will need and drew up the budget estimate.

B. Methodology and Steps of the Expertise

The **methodology** proposed for the Expertise in the Alternative Work Proposal combines the following types of activities: a technical examination of the Claimants' Database and its functionality, including the entry/migration of the information into the Database, with the assistance of an IT specialist experienced in database design and systems analysis; the initial examination and verification of the information and documentation relating to a small sample of claims, to inform the conduct of the review of all relevant claims information and documentation; the individual examination and verification of the relevant information and documentation relating to all claims to achieve the aim of the Expertise as set out in paragraphs 19 to 21 of Procedural Order No. 15; and the presentation of the results of the database and claims review in the Verification Report, including the issues set out in paragraph 21 of Procedural Order No. 15.

The following **steps** are planned for the conduct of the Expertise (the deadlines assume submission of the Parties' materials by 28 January 2013; should this date be moved, the deadlines would need to be moved accordingly):

- (i) Preparatory work – The documents and expert reports submitted by the Parties, as well as their summary statements, will be considered and taken into account in the conduct of the Expertise. The information and documentation relating to an initial sample of 50 claims will be examined and verified; the results of this initial review will inform the organization and conduct of the review of all the remaining claims. Review guidelines

and result sheets will be drafted following this initial review, and a training will be conducted for the claims reviewers.

TO BE COMPLETED BY 11 FEBRUARY 2013

- (ii) Technical examination of the Claimants' Database – The IT specialist will review the design and the logical model of the Database and the related documentation; this will include testing data types, lengths, default values etc. of attributes. He will review the security features of the database and the data, and he will examine what audit trails exist to track changes on the database. He will also examine according to what procedures the information from outside sources was entered and/or migrated into the Database, and what quality control was performed in this respect. The IT specialist will search the Database for duplicates. And he will perform SQL queries to run reports and identify categories and/or groups of claims as specified by the Expert in the preparation and during the course of the claims review.

TO BE COMPLETED BY 11 FEBRUARY 2013, EXCEPT FOR ONGOING SQL QUERIES

- (iii) Claims review (natural persons) – The review of the claims of natural persons will be performed by claims reviewers. Each reviewer will be assigned the range of file numbers of the claims that he or she should review. The examination and verification of the information and the documents related to a claim will include the following: search of the claim by name and file number in Annex A_Index and in Annex A_Master; access of the claim by file number on the Database; examination of the relevant information in the tabs for completeness, consistency, any discrepancies, duplication or other vice; verification of the information against the documents related to the claim; and completeness and accuracy of the relevant documents. The findings of this review will be recorded in a standardized manner in a result sheet. Direction and supervision will be provided through the review guidelines developed by the Expert and through regular quality control performed by the Expert; the Expert will be assisted in this by a senior claims reviewer.

For the purposes of resource estimation, the Work Proposal assumed that the review of one claim (including the recording of the findings and their initial analysis) would on average take 15 minutes; this was based on the experience from the initial review of the 50 claims performed as part of the preparation of the Work Proposal, as well as on the likely characteristics of the sample claims to be reviewed in the Expertise.

The average time for the individual review of a claim of a natural person is anticipated to be less than 15 minutes. Individual review and the recording of the results of that review will be more straightforward than the corresponding activities for sample claims. In addition, the slowing-down effect of the “learning curve” is more significant when the claims population to be reviewed is relatively small, compared to a lesser impact on the total (and therefore average) review time in the case of a large claims population. On the other hand, the undersigned has not been able to achieve the average review time of only 3 minutes that has been anticipated by the Claimant’s Expert Mr. Kaczmarek. During additional sample reviews in preparation of the Alternative Work Proposal, the average review time per claim (including the recording of results) has been at least 6 minutes. Some of the factors slowing down an otherwise relatively straightforward review have included the following: duplication of underlying documents, with the corresponding need for additional comparisons; mixing of pages from different documents; discrepancies in domicile information; and difficulty in matching nationality dates in documents with the jurisdictional dates.

For purposes of resource and budget estimates, the undersigned is therefore assuming an average review time of 6 minutes per natural persons claim. For 54,000 claimants, this average results in a total review time of 324,000 minutes; or 5,400 hours; or 675 work days (at 8 hours); or 135 work weeks (at 5 days). **With 15 claims reviewers, the total review time would thus be 9 weeks.** It is proposed that the progress of the review be monitored on a weekly basis and the resources be adjusted should deviations from the assumed average so require.

REVIEW OF CLAIMS BY NATURAL PERSONS TO BE COMPLETED
BY 2 APRIL 2013

- (iv) Claims review (non-Italian co-owners and juridical entities) – In view of their small number and the importance of the nationality issue, all claims involving co-ownership with non-Italians (Annex B) will be reviewed by the Expert. Similarly, all claims of juridical entities (Annex C) will be reviewed by the Expert, with a focus on incorporation and authorized signatory information and documents where it appears that the claim is made by a non-commercial entity. The findings of this review will be recorded for each claim in a standardized manner in a result sheet.

TO BE COMPLETED BY 4 MARCH 2013

- (v) Draft Verification Report – The Expert will draft a report in English containing the information listed in paragraph 34 of Procedural Order No. 15 (“Draft Verification Report”).

TO BE ISSUED TO THE ARBITRAL TRIBUNAL AND THE PARTIES
BY 15 APRIL 2013

With the assistance of the ICSID Secretariat, the Expert will arrange for a Spanish translation of the Draft Verification Report to be sent to the Arbitral Tribunal and the Parties.

WITHIN 10 DAYS OF THE ISSUANCE OF THE DRAFT
VERIFICATION REPORT

- (vi) Following examination of the Parties’ comments on the Draft Verification Report, the Expert will prepare the Final Verification Report.

TO BE ISSUED TO THE ARBITRAL TRIBUNAL BY 30 MAY 2013

With the assistance of the ICSID Secretariat, the Expert will arrange for a Spanish translation of the Final Verification Report to be sent to the Arbitral Tribunal and the Parties.

WITHIN 10 DAYS OF THE ISSUANCE OF THE FINAL
VERIFICATION REPORT

C. Team Proposed to Assist in the Expertise

The team that is proposed to assist the Expert in the conduct of the Expertise and whose approval for this purpose the undersigned seeks from the Arbitral Tribunal, consists of persons with relevant experience. The undersigned has worked with all of them in the context of various claims programs and has thus personal knowledge of their respective qualifications and experience. Without disclosing any relevant information, the undersigned has inquired from these persons whether they would in principle be interested and available to perform the type of work for which they are proposed, and most have confirmed that they so would. For submission of the Work Proposal, the undersigned had asked Andrew Tatam and Tanja Zvekić-Devetak, the two persons with particular expertise, to provide him with their CVs.

Andrew Tatam is proposed to perform the examination of the Claimants' Database from a technical IT point of view and to run queries and reports on the Database as required by the Expert for the conduct of the Expertise. Mr. Tatam has extensive experience in systems analysis, database and process design, and Web-based applications in the context of international mechanisms for the resolution of large numbers of claims. One of his recent assignments was the review and assessment of a database containing large volumes of information and documents relating to a potential program for the resolution of Palestinian property claims. The undersigned has worked with Mr. Tatam in the context of various claims resolution mechanisms. Mr. Tatam's qualifications and relevant professional experience are summarized in his attached CV (**Annex 1.**)

Given the large number of claims to be reviewed and the amount of direction and supervision required, the Expert proposes to have the assistance of a person with relevant experience in this respect. This senior claims reviewer will spend on average one day per week on this assistance to the Expert, and will perform claims review during the remaining time. The senior claims reviewer will also be available for more difficult Italian language questions. The person proposed as senior claims reviewer is **Tanja Zvekić-Devetak**. From her work in the German Forced Labour Compensation Programme (GFLCP) of the IOM, Ms. Zvekić-Devetak, who is fluent in Italian, has considerable experience with the examination and verification of electronically held information and documents related to claims, with the analysis of the results of such review, and with leading teams of claims reviewers. The undersigned worked with her

in GFLCP. Ms. Zvekcic-Devetak, who worked in particular on the Italian claims in that program, does not know whether any of the Italian claimants under GFLCP are among the Claimants in this case. Like the undersigned and all other staff of GFLCP, Ms. Zvekcic-Devetak was under an obligation to perform her duties with independence and impartiality, which she did. Ms. Zvekcic-Devetak's qualifications and relevant professional experience are summarized in her attached CV (**Annex 2.**)

The undersigned has identified 15 persons with whom he worked at different points in time in various claims programs and whom he intends to propose as **claims reviewers** for the Expertise. All of these persons are familiar with the requirements of a claims program and are conscious of the need to be diligent and consistent in the application of the rules and guidelines of such a program. Given the short time available for the submission of the Alternative Work Proposal, it has not yet been possible to obtain the confirmation of their participation from all these persons, but the undersigned anticipates that this can be done by 28 January 2013. At that time, the undersigned will submit the names of the confirmed claims reviewers and a description of their qualifications and experience.

Should the persons proposed to assist the Expert be approved by the Arbitral Tribunal, they should be granted the necessary access to the Claimants' Database under the same conditions as the Expert.

D. Documents and Information Needed

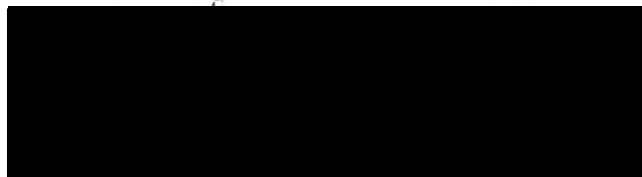
The following documents and information are needed for the conduct of the Expertise:

- (i) Documentation on the Database model and the application design;
- (ii) Information and documentation as to how the entry of the data into the Database and/or the migration of the data from third sources was performed and about the quality control that was conducted in this respect;
- (iii) Access to the Database in a format on which SQL queries and reports can be run;

- (iv) Guidelines for the efficient access to the information and documents contained in the Database and for the appropriate navigation of the Database;
- (v) An explanation as to how the information and documents in the Database will be dealt with in relation to those claims that will in future be withdrawn or whose claimants will die;
- (vi) A clarification of the following issue: will the Database to be submitted to the Expert by 28 January 2013 contain the same information and/or documents as the Database that was provided to the undersigned on 22 November 2012? If not, what will be the differences, and how will such differences be traceable?
- (vii) An explanation of the impact, if any, on the speed and easiness with which the Claimants' Database can be accessed and navigated when this is done by up to 20 persons simultaneously (assuming the Expert and his personnel will access the Claimants' Database over the Internet.)

E. Budget Estimate

The attached budget document (**Annex 3**) details the fees and expenses estimated for the Expertise. The total of the Budget Estimate amounts to **USD 270,350**. This includes remuneration for time spent by the undersigned in relation to the preparation of the Work Proposal and the Alternative Work Proposal in the amount of USD 23,800; remuneration for the time estimated to be spent by the Expert in relation to the Expertise in the amount of USD 65,800; estimated expenses for the persons proposed to assist in the Expertise in the amount of USD 180,250; and cost of USD 500 for a roundtrip Geneva-Hamburg, for the Expert to work with the IT specialist on the specifications for SQL queries and reports.



Dr. Norbert Wühler

Annexes

Annex 1: CV of Andrew Tatam

Annex 2: CV of Tanja Zvekic-Devetak

Annex 3: Budget Estimate

Andrew Tatam

Nationality	British, Australian
Education	Diploma in Management Studies, HNC and ONC Business Studies
Languages	English, German, basic French
Role	Senior Project Manager / Database and Process Designer
Focus	Claims processing Database and process design Document management Cloud computing CRM (analytical and operational) ERP (Financials and HRMS) Web analysis und reporting
Projects Commercial	Coca Cola, Commonwealth Bank of Australia, E-Plus Gruppe, German Stock Exchange, Opel, J. Sainsburys, Saudia, Vienna Energy, Vodafone
Projects Other	CRRPD, ECCC, ICC, IOM, IPS, Sydney University, UNCC
Tools	Oracle, SQL Server, MS Project, Reporting Services, Siebel, PeopleSoft, Oracle Financials, Chordiant, Clarify, ServiceNow, Newscale, SQLWindows, SQATeamtest, Mercury Interactive, ERWIN/ERX, ER Studio
Project Countries	Australia, Austria, Cambodia, Dubai, Egypt, Germany, Guatemala, Israel and Palestine, Jordan, Netherlands, Saudi Arabia, Sierra Leone, Switzerland, Turkey, United Kingdom

Professional Experience (Claims Programs)

Extensive experience in domestic and international IT project management; special focus on system and database design and processing.

Expertise in leading process design, transformation change and change management, especially in large international organizations and tribunals and commissions managing claims and reparation programs.

Experienced in software development and implementation, document management, multiple database environments, management of large teams and budgets.

Worked for or advised the following organizations concerning the IT support for claims programs, in particular database design and processing tools: United Nations (UN Compensation Commission), International Organization for Migration (German Forced Labour Compensation Programme), International Criminal Court (Victims Support Unit), Extraordinary Chambers in the Courts of Cambodia (ECCC), Commission for Real Property Claims in Iraq, Institute for Palestine Studies (UN Conciliation Commission for Palestine Database), Sierra Leone Reparation Program.

Contact

Foehrenweg 2a
21220 Seevetal
Germany

Employer

Affinis, Germany

CURRICULUM VITAE

Tanja Zvekic-Devetak

Chemin de la Boissierette 11, 1208 Geneva, Switzerland

I. Education

University

- | | |
|---------|---|
| 1996-97 | University of Leiden, Faculty of Law, The Netherlands
Master of Laws (LL.M) in International Law |
| 1993-96 | University of London, Faculty of Law, United Kingdom
Bachelor of Laws (LL.B) (Second Class Honours) |

II. Relevant work experience

Dates of employment:	September 2002 - October 2004
Position:	Associate Legal Officer/Legal Officer German Forced Labour Compensation Programme (GFLCP)
Employer:	International Organization for Migration (IOM) Geneva, Switzerland (HQ)

Responsible for the preparation of “tranches” of claims to be submitted to the German Federal Foundation for approval. In particular, the work involved:

- Carrying out legal and factual research related to particular categories of claims;
- Identifying and analyzing factual and legal issues raised by individual claims and by categories of claims, and submitting proposals for their resolution;
- Drafting legal memoranda, legal and processing guidelines for claims assistants, claims summaries, and reports on groups and categories of claims;
- Supervising the review of claims by claims assistants, and developing a quality control system for the claims review;
- Participating in the drafting of specifications to the IT Team for the database and software applications that facilitated the claims processing;
- Preparing requests to the IT team for computer actions to support the claims review and resolution.

In addition, responsible for the planning and coordination of the review of claims filed by persons of Italian nationality (the largest claimant group of the Programme - 130,000 claims), as well as of claims filed by persons from former Yugoslavia (the largest group of compensable claims - 30,000 claims).

Dates of employment: September 2000 - September 2002
Position: **Project Manager/Field Office Co-ordinator**
German Forced Labour Compensation Programme (GFLCP) and
Holocaust Victims' Assets Programme (HVAP)
Employer: International Organization for Migration (IOM)
Rome, Italy

Responsible for the planning, direction and supervision of operational activities carried out in Italy relating to the implementation of GFLCP and HVAP. In particular, the work involved:

- Organizing the Programmes' outreach activities;
- Maintaining contacts and developing co-operation with victims' associations, unions and other concerned parties;
- Co-ordinating and supervising the GFLCP/HVAP staff in the activities of claimant assistance, claims intake and registration, and review and evaluation of the claims;
- Assisting the IOM Chief of Mission in his contacts with representatives of the Government of Italy and other counterparts relevant to the Programmes;
- Preparing briefs, information notes and other materials for the media and the public;
- Carrying out historical and legal research and collecting relevant background information.

III. Languages

Serbian	mother-tongue
English	bilingual proficiency
Italian*	bilingual proficiency
Spanish	working knowledge
French	working knowledge

*Lived in Rome (Italy) for a total of 14 years. Completed the compulsory school diploma ("terza media") in 1989, attended several courses at Luiss Guido Carli (Faculty of Law) in 1998, worked as legal apprentice for a law firm in Rome(1998-2000) and as a Project Manager with IOM Rome (2000- 2002).

IV. Computer Skills

MS Office; Oracle GFLCP-customized applications

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WUEHLER - ALTERNATIVE WORK PROPOSAL, ANNEX 3 (BUDGET ESTIMATE)					
Activity	Resource	Days	Rate	USD	
WORK PROPOSALS					
Access and navigation of Database	Wuehler	0.5	2800	1400	
Claims review	Wuehler	2.5	2800	7000	
Sample determination	Wuehler	0.5	2800	1400	
Drafting of Work Proposal	Wuehler	2	2800	5600	
Identification of claim reviewers	Wuehler	2	2800	5600	
Drafting of Alternative Work Proposal	Wuehler	1	2800	2800	
SUB-TOTAL		8.5		23800	
PREPARATORY WORK					
Consideration of Parties' submissions	Wuehler	2	2800	5600	
Initial claims review (sample of 50)	Wuehler	1.5	2800	4200	
Analysis of results, initial claims review	Wuehler	1	2800	2800	
Training of claim reviewers	Wuehler	1	2800	2800	
SUB-TOTAL		5.5		15400	
TECHN. EXAM. OF DATABASE					
Review of design and logical model	Tatam	1	1400	1400	
Testing of attributes	Tatam	0.5	1400	700	
Review of security and auditability	Tatam	1	1400	1400	
Audit of entry/migration of data	Tatam	0.5	1400	700	
SQL queries for groups and patterns	Tatam	2	1400	2800	
SUB-TOTAL		5		7000	
CLAIMS REVIEW					
Non-Italian co-owners (18 claims)	Wuehler	0.5	2800	1400	
Juridical entities (94 claims)	Wuehler	3	2800	8400	
SUB-TOTAL		3.5		9800	
CLAIMS REVIEW					
Natural persons (54000 claims)	15 claims rev's	675	250	168750	
Coordination, quality control	Wuehler	4.5	2800	12600	
Coordination, quality control (assist)	Zvekic	9	500	4500	
SUB-TOTAL				185850	
DRAFT VERIFICATION REPORT					
Analysis of results of claims review	Wuehler	2	2800	5600	
Writing of Draft Verification Report	Wuehler	3	2800	8400	
Arranging of Spanish translation	Wuehler	1	2800	2800	
SUB-TOTAL		6		16800	
FINAL VERIFICATION REPORT					
Examination of the Parties' comments	Wuehler	1	2800	2800	
Writing of Final Verification Report	Wuehler	2	2800	5600	
Arranging of Spanish translation	Wuehler	1	2800	2800	
SUB-TOTAL		4		11200	
One roundtrip Geneva-Hamburg				500	
TOTAL				270350	

ICSID Case No. ARB/07/5

**ABACLAT AND OTHERS
(CLAIMANTS)**

and

**THE ARGENTINE REPUBLIC
(RESPONDENT)**

DESCRIPTION OF CLAIMS REVIEW TEAM

**in accordance with paragraph 23
of Procedural Order No. 15
and Message of the President of the Tribunal
of 25 January 2013**

submitted by

Dr. Norbert Wühler

28 January 2013

Background

This **Description of Claims Review Team** is submitted in response to the message from the President of the Tribunal that was conveyed to the undersigned by email from the ICSID Secretariat of 25 January 2013. In this message, the undersigned was requested to send to the Arbitral Tribunal by 28 January 2013 the list and CVs of the additional 15 reviewers that he intends to recruit for the review process. The undersigned had anticipated in his Alternative Work Proposal to submit such list and details by this date.

Proposed Review Team

The persons that the undersigned proposes to recruit for the review process are listed below. A summary CV with a description of their pertinent qualifications and experience is attached for each reviewer. As stated in the Alternative Work Proposal, the undersigned has worked with these persons in various claims programs. He is therefore confident that they are familiar with the requirements of a claims program and that they are conscious of the need to be diligent and consistent in the application of the rules and guidelines of such a program.

The undersigned would like to add the following explanatory notes. Some of the persons listed will, if approved, not work during the whole period foreseen for the review process, mostly due to travel arrangements already fixed and paid. Taking this into account, one additional person beyond the 15 anticipated in the Alternative Work Proposal is proposed to be recruited, and some of the other persons listed are ready to work more than the average anticipated time, so that the completion of the review process within the foreseen timeframe can be ensured. To allow the necessary adjustments, the review progress will be monitored on a weekly basis.

Should one or more of the reviewers not be available to work the anticipated time for reasons not foreseen, and should it not be possible to make up for this shortage

through extra work by members of the existing team, including Ms Zvekic-Devetak, the undersigned would seek the permission of the Tribunal to add additional reviewers as needed, subject to the Tribunal's approval.

Finally it should be noted that all the persons proposed, including those with high-level qualifications and experience, are aware of the type of review work involved in the Expertise and are in their current professional situation or otherwise ready to perform this type of work.

List of Reviewers

The following persons are proposed to be recruited for the review process, and the Arbitral Tribunal's approval is sought for their recruitment:

Mr Kresimir Babic

Mr Christof Bareiss

Ms Stephanie Berry

Mr. Örs Bolvary

Ms Magdalena Chrusciel

Ms Judith Cole

Mr Yariv Friedman

Ms Karolina Januszko

Ms Tereza Kralj Lowe

Mr Ariaan Kroeskop

Ms Denise Landolt

Ms Mariana Le Cocq

Ms Heike Niebergall

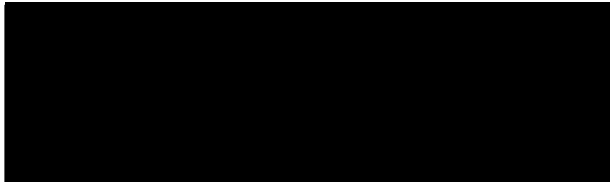
Ms Latifa Nouhaili

Ms Joanne Pretty

Ms Barbora Simerova

Summary CVs of Proposed Reviewers

Attached is a summary CV for each reviewer containing a description of his or her pertinent qualifications and experience.



Dr. Norbert Wühler

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SUMMARY CVs OF REVIEW TEAM

KRESIMIR BABIC

Residence

Geneva, Switzerland

Nationality

Irish and Croatian

Education

MSc in Computer Engineering

Relevant Experience

Systems Analyst, UNPF Croatia and UNV Germany

IT Specialist (network and claims database maintenance), German Forced Labour Compensation Programme (GFLCP) and Holocaust Victim Assets Programme (HVAP), IOM Geneva

- Support of claims processing, review of claims to inform optimization of database use

Relevant Skills

Assessment of claims, use of claims database

Current Situation

IT consultant (free-lance)

CHRISTOF BAREISS

Residence

Geneva, Switzerland

Nationality

Swiss

Education

Master in Political Science and in Public Administration

Relevant Experience

Claims Assistant in Forced Labour and Appeals Teams, German Forced Labour

Compensation Programme (GFLCP), IOM Geneva

Legal Associate, Global Alliance for Improved Nutrition

- Review of claims to determine eligibility under the program

Relevant Skills

Assessment of claims, use of claims database

Current Situation

Just completed Master Thesis, looking for new position

STEPHANIE BERRY

Residence

Geneva, Switzerland

Nationality

British, German

Education

Master in International Political Economy

Relevant Experience

Intern, Reparation Programs, IOM Geneva

Trainee, European Parliament

Junior Professional Officer, OSCE

- Review of claims against formal requirements

Relevant Skills

Assessment of claims, use of databases

Current Situation

Volunteer work for Amnesty International, Geneva

OERS BOLVARY

Residence

Geneva, Switzerland

Nationality

Hungarian

Education

Master in Law, LL.M. (Commercial Law)

Relevant Experience

Staff Attorney, Claims Resolution Tribunal (CRT), Zurich

Associate Legal Officer, Property Loss Team, German Forced Labour Compensation Programme (GFLCP), IOM Geneva

- Review and legal assessment of claims to determine eligibility under the program

Relevant Skills

Legal, assessment of claims, use of claims database

Current Situation

Human Rights Adviser, Permanent Mission of Hungary to the UN, Geneva

MAGDALENA CHRUSCIEL

Residence

Geneva, Switzerland

Nationality

Swiss

Education

Master in Literature

Relevant Experience

Translator, state courts and international organizations

Claims Assistant, Forced Labour Team, German Forced Labour Compensation

Programme (GFLCP), IOM Geneva

- Review of claims to determine eligibility under the program

Relevant Skills

Assessment of claims, use of claims database

Current Situation

Translator (free-lance), Geneva courts

JUDITH COLE

Residence

Geneva, Switzerland

Nationality

United States

Education

JD in Law

Relevant Experience

Attorney, Office of the Legal Adviser, US State Department

Senior Legal Officer and Team Leader, United Nations Compensation Commission (UNCC)

Deputy Director, Claims Processing, German Forced Labour Compensation

Programme (GFLCP) and Holocaust Victim Assets Programme (HVAP), IOM

Geneva

- Management of claims processing, review and legal assessment of claims to determine eligibility under the programs

Relevant Skills

Legal, assessment of claims, use of claims database

Current Situation

Adjunct Professor (part-time), International University in Geneva

YARIV FRIEDMAN

Residence

Geneva, Switzerland

Nationality

Israeli

Education

Degree in Law and Economics

Relevant Experience

Associate Legal Officer, Holocaust Victim Assets Programme (HVAP), IOM Geneva

- Review and legal assessment of claims to determine eligibility under the program

Relevant Skills

Legal, assessment of claims, use of claims database

Current Situation

Producer of documentaries (just finished latest project)

KAROLINA JANUSZKO

Residence

Grafenried, Switzerland

Nationality

Polish

Education

Master in Law, LL.M. (International Law)

Relevant Experience

Associate Legal Officer, Property Loss Team, German Forced Labour Compensation Programme (GFLCP), IOM Geneva

Staff Attorney, Claims Resolution Tribunal (CRT), Zurich

- Review and legal assessment of claims to determine eligibility under the programs

Relevant Skills

Legal, assessment of claims, use of claims database

Current Situation

Occasional project work

TEREZA KRALJ LOWE

Residence

Versoix, Switzerland

Nationality

Macedonian

Education

Freight and Forwarding Customs Manager

Relevant Experience

Operations Assistant, IOM Skopje

Financial Management Assistant, German Forced Labour Compensation Programme (GFLCP), IOM Geneva

- Verification of claimant beneficiaries, preparation and tracking of compensation payments

Relevant Skills

Review of claimant information against payment criteria, use of claims database

Current Situation

Not working

ARIAAN KROESKOP

Residence

Geneva, Switzerland

Nationality

Dutch

Education

Master in Law, LL.M. (International Law)

Relevant Experience

Chamber Clerk and Legal Assistant, Iran-US Claims Tribunal

Chief, Claims Registry, United Nations Compensation Commission (UNCC)

- Review and assessment of claims to determine eligibility under the programs

Relevant Skills

Legal, assessment of claims, use of claims database

Current Situation

Retired

DENISE LANDOLT

Residence

Mies, Switzerland

Nationality

Swiss

Education

High School Diploma

Relevant Experience

Swiss Air Town Office Manager

Claims Assistant, Forced Labour Team, German Forced Labour Compensation Programme (GFLCP), IOM Geneva

- Review of claims to determine eligibility under the program

Relevant Skills

Assessment of claims, use of claims database

Current Situation

Retired

MARIANA LE COCQ

Residence

Geneva, Switzerland

Nationality

Swiss

Education

Institut BYVA Geneva (Assistante de Direction), Swiss Institute of Public Relations

Relevant Experience

Assistant to Executive Secretary, United Nations Compensation Commission (UNCC)

External Asset Manager, Bank Sarasin, Geneva

- Review of claims during peak work loads

Relevant Skills

Assessment of claims, use of claims database

Current Situation

Not working

HEIKE NIEBERGALL-LACKNER

Residence

Geneva, Switzerland

Nationality

German

Education

Degree in Law, LL.M. (International Law)

Relevant Experience

Deputy Secretary General, Claims Resolution Tribunal (CRT), Zurich

Senior Legal Officer, Reparation Programs, IOM Geneva

- Management of claims processes, review and legal assessment of claims to determine eligibility under the programs

Relevant Skills

Legal, assessment of claims, use of claims database

Current Situation

On special leave without pay from IOM (finishing Ph.D.)

LATIFA NOUHAILI

Residence

Geneva, Switzerland

Nationality

Moroccan, Swiss

Education

Master in Law, Master in Development Studies

Relevant Experience

Associate Legal Officer, United Nations Compensation Commission (UNCC)

Project Officer, Reparation Programs, IOM Geneva

- Review and legal assessment of claims to determine eligibility under the programs

Relevant Skills

Legal, assessment of claims, use of claims database

Current Situation

Just completed temporary assignment in Office of the Legal Counsel, WIPO

JOANNE PRETTY

Residence

Geneva, Switzerland

Nationality

Canadian

Education

BA in Psychology and Sociology

Relevant Experience

Foreign Claims Officer, Department of Foreign Affairs & International Trade, Canada

Editorial Assistant, United Nations Compensation Commission (UNCC)

Registry Coordination Officer, German Forced Labour Compensation Programme (GFLCP), IOM Geneva

- Review of claims, supervision of Legal Successors Team

Relevant Skills

Assessment of claims, use of claims database

Current Situation

Not working

BARBORA SIMEROVA

Residence

Geneva, Switzerland

Nationality

Czech

Education

Master in Media Studies

Relevant Experience

Outreach Campaign Manager, German Forced Labour Compensation Programme (GFLCP) and Holocaust Victim Assets Programme (HVAP), IOM Geneva
Team Leader, Personal Injury Claims, German Forced Labour Compensation Programme (GFLCP), IOM Geneva

- Review of claims to determine eligibility under the program

Relevant Skills

Assessment of claims, use of claims database

Current Situation

Fund Raising Campaign Manager, IOM (part-time, just ending)